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Attorneys for Defendant Ally Bank

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MARIELA AGUILAR VELAZQUEZ, on behalf of herself and all others similarly situated,)	Case No. 2:21-cv-02375-MCE-DB
)	
Plaintiff,)	
)	JOINT STATUS REPORT AND
vs.)	STIPULATION AND
)	ORDER TO FURTHER
ALLY BANK,)	<u>STAY CASE DEADLINES</u>
)	
Defendant.)	The Honorable Morrison C. England, Jr.
)	
)	

1 Pursuant to the Court's order (ECF No. 20), Defendant, Ally Bank, and Plaintiff, Mariela
2 Aguilar Velazquez (together, the "Parties"), respectfully submit this joint report on the status of the
3 Parties' settlement discussions.

4 On January 27, 2022, the Court entered an order granting the Parties' Stipulation and Order
5 Pursuant to Local Rule 144(a) For Extension of Time to Respond to Complaint (ECF No. 11).
6 Subsequently, on March 16, April 22, and June 1, 2022, the Court entered orders granting the Parties'
7 Stipulation and Order to Stay Case Deadlines (ECF Nos. 16, 18, 20) to enable the Parties to engage in
8 settlement discussions and explore resolution of the case without litigation.

9 On June 27, 2022, the Court entered an order granting the Parties' Protective Order and
10 Confidentiality Agreement Concerning Confirmatory Discovery (ECF No. 22).

11 The Parties have exchanged initial settlement offers and confirmatory discovery, and
12 settlement discussions are ongoing. Accordingly, the Parties believe that good cause exists for the
13 Court to stay case deadlines for an additional 45 days, which will conserve the Court's and Parties'
14 resources and allow the Parties further time to discuss a potential settlement and, if necessary, conduct
15 confirmatory discovery. Accordingly, the Parties respectfully request that the Court enter an order
16 extending the case deadlines as follows:

17
18 1. The case is stayed to enable the Parties to continue to engage in settlement
19 discussions.

20 2. Defendant's deadline to file a response to the Complaint shall be extended from
21 July 15, 2022 to August 29, 2022; Plaintiff's deadline to file any opposition to the motion shall be
22 September 29, 2022; Defendant's deadline to file any reply in support of the motion shall be
23 October 27, 2022; and the hearing on the motion shall be scheduled for November 10, 2022.

24 3. In the event the Parties continue to make progress towards settlement and
25 require a further stay, the Parties shall submit to the Court an additional joint report concerning the
26 status of the Parties' efforts to resolve the case and requesting a further stay on or before
27 August 22, 2022.
28

4. Nothing in this stipulation is intended, or shall be deemed, to waive or otherwise prejudice any Party's rights, claims, defenses, motions, or objections (whether to jurisdiction, service, or otherwise) in this case.

Dated: July 8, 2022

Respectfully submitted,

/s/ Diane L. McGimsey

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IT IS SO ORDERED.

Dated: July 12, 2022


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE